

# Midlothian Council Equality Impact Assessment Form



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**Lead contact:**

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## **Section A: Introduction**

### **1. Title of policy, procedure or function being assessed**

Housing Revenue Account – Rent Setting Strategy 2019/20 – 2021/22

### **2. Divisions/organisations/groups involved in doing this Equality Impact Assessment**

Customer and Housing Services

### **3. Date started:**

November 2017

### **Date completed:**

January 2018

## **Section B: Information**

### **4. Please describe the Policy, Procedure or Function you are impact assessing**

The Rent Setting Strategy 2019/20 – 2021/22 sets out recommendations for future rent increases for council housing in Midlothian. The Strategy is informed by a consultation exercise held by the Council in order that the views of tenants and applicants on the housing list are considered before Midlothian Council agrees any annual rent increase.

The outcome of the Rent Setting Strategy will directly influence the level of investment in existing council housing (including regeneration) and will also determine the number of new council homes that can be built within the next five years. Plans for new build housing would include liaison with Health and Social Care colleagues to ensure that additional specialist provision housing is developed, such as for older people or those with complex care needs.

A special newsletter edition of “*Tenants Today*” was sent out to all Council Tenants and Housing List Applicants along with a Survey Form and freepost envelope which gave tenants and applicants a vote on four possible rent

increase options. The newsletter and survey was sent to 10,577 households providing the opportunity for as many service users as possible to have their say. Midlothian Council's *communicating clearly* information was printed on this newsletter, making it clear that alternative formats of the newsletter and survey including translation or braille are available upon request.

Three members of Midlothian Council's Tenant Panel read through the draft Newsletter and Survey Form and commented on the readability and format of the documents to ensure that the information being provided was useful and easy to understand.

An online version of the Newsletter and Survey was made available to increase the accessibility of engagement with the Council.

Drop in Meetings were held in four different areas of Midlothian. Some meetings were in the evening in order that people who worked during the day could attend. Drop in Meetings were felt to be useful for people who wanted to ask questions or preferred communicating face to face. In addition Midlothian Council met with local tenants groups and Midlothian Tenant Panel to seek their views on the Rent Setting Strategy.

## **5. What information and consultation data do you have to inform your assessment? What does it tell you?**

A total of 1,040 responses were received to the Survey. A significant number of respondents raised questions and made comments and many of these were responded with an explanation to ensure greater openness and understanding of the decision-making process. A significant number of responses raised issues in terms of rent increases and how this might affect those on low incomes. However, a balance has been sought between maintaining the affordability of existing rents and providing more new housing which will help meet a diverse range of needs including those at risk of homelessness and poverty and providing housing suitable for individual health needs.

The affordability of housing and the development of new affordable housing was included as part of Consultation on the Local Housing Strategy 2013 - 2017. The Local Housing Strategy is the key document which sets out outcomes for future housing investment in Midlothian. In particular, the outcome: "Households have improved housing options across all tenures" relates to the accessibility of social rented housing and investment in new housing. Considerable effort was made in a separate consultation process to engage with all sections of the community in order that their views formed the development of the LHS.

The Strategy was circulated to groups for feedback which included:

- Equalities Groups, including support groups, societies and campaigning organisations on race, equality, older people, carers, Lesbian, gay, bisexual and transgender, older people's, ethnic minority groups, disabled, young

people's groups, armed forces veterans, substance abuse, physical disability and learning disability.

- Housing organisations, including registered social landlords, house builders, letting agents, landlord associations, relevant Scottish Government departments, and housing organisations groups such as Shelter and the Scottish Federation of Housing Associations.
- Community Groups, including community councils, voluntary groups, Registered Tenants Organisations and residents groups.
- Other organisations, including neighbouring local authorities and the Scottish Futures Trust.

These groups were also invited to attend either an LHS Stakeholder Event or "Drop In" Events while some groups requested to meet with Council Officers to discuss strategic objectives. During these events, participants were asked to consider the priorities for the Local Housing Strategy; consequently, a number of areas relating to new affordable housing provision were highlighted as priority areas.

Additional information was also obtained from other sources including:

- SESPlan (South East Scotland) Housing Need & Demand Analysis 2
- Housing Waiting List Survey
- Council Housing New Build Survey
- Registered Tenant Organisations feedback
- Registered Social Landlords feedback
- Feedback from Local Housing Strategy Working Group and Community Planning Partnership Groups
- Midlothian Council Tenant Surveys

Housing applications and Allocations are also monitored for:

- Gypsy Travellers
- Minority Ethnic Households
- Households with Disabilities

The above areas of research and engagement provide the Council and partners with relevant knowledge on the housing needs of equality groups which are then incorporated into future investment plans which includes specialist provision to meet identified needs.

An update on how the LHS is performing will be carried out in 2018. This update will provide information on how the Council has performed in its commitments, including in terms of how well the housing needs of equality groups are being met.

## **6. Do you need more information or more consultation/engagement data?**

- Do you need anything more:
  - i. to do this Equality Impact Assessment (EQIA)
  - ii. to monitor or assess, in future, the impact of the policy/procedure or function you are EQIAing on people with different equalities characteristics
- Lack of data is not a sufficient reason to conclude there is no impact. It is insufficient to state that a policy will affect everyone equally without having considered the different barriers some people may encounter.

Analysis was carried out on the results to note if there were significant variations in the Options that Tenants and Housing Applicants voted for. There was not a significant difference in the results when analysed by age of tenant, gender, disability or ethnicity. The Housing Service does not record information on sexual orientation so this could not be analysed.

## **Section C: Assessment**

Midlothian Council equality impact assesses on **all** of the characteristics in the shaded area below, so you should consider all of these in your assessment. If you want you can consider other groups as well.

**Race** (this includes ethnic or national origins, colour and nationality)

**Disability** (e.g. physical disabilities, sensory impairments, learning disabilities, mental health conditions or long-term illnesses)

**Sex**(male/female)

**Age** (all ages)

**Sexual Orientation** (gay man, gay woman/lesbian, bisexual, heterosexual/straight)

**Religion or belief** (including having no religion or belief)

**Pregnancy and maternity** (having just had a baby or being pregnant)

**Gender reassignment** or transgender status (a person who is proposing to undergo is undergoing or has undergone a process to change their sex)

**Marriage and Civil Partnership**

**People experiencing poverty or at risk of poverty:** (poverty may be simply defined as not having enough money to meet one's basic daily needs or to have the things that most people in the UK take for granted).

**As you answer questions 7i. to 7iv. over the page:**

**a) Think about the policy, practice or function you are assessing and**

- people with the above characteristics
- people associated with them (e.g. a parent or carer)
- people mistakenly assumed to have the above characteristics

Remember to consider impacts on staff as well as communities and customers.

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**b) Consider whether the above people are likely to have different needs, or be**

**affected in different ways by what you are doing/proposing. e.g.**

- People may need, or benefit from, information provided in a particular format, like large print or easy read.
- A queuing system which relies on people standing for long periods will make it very difficult for some people to use the service.
- Charging more for a service is likely to affect people from several of the groups in the shaded area above, as on average they have a lower income.
- Targeting an area of high poverty could leave people experiencing poverty outside the area even worse off in comparison

**c) Consider the General Equality Duty requirements to pay due regard to the need to:**

- eliminate discrimination, victimization, harassment or other local conduct that is prohibited under the Equality Act 2010 in relation to the characteristics listed in shaded area at the top of this page (except poverty)
- advance equality of opportunity between and foster good relations between people who share a characteristic in the shaded area and those who do not (except marriage and civil partnership and poverty)

**7i. Note any positive impacts on the above equalities groups**

The new Rent Setting Strategy is likely to have a positive impact across several equality strands due to it being able to secure significant additional investment in council housing. It will be able to commit to additional investment in specialist provision for households with Complex Care Needs, Extra Care Needs, Wheelchair and Bariatric Housing and for disabled war veterans. It will also maintain rents at a level close to the Scottish average and it has been calculated that a low income household earning the Minimum Wage would be able to afford the average cost of a council house rent.

**7ii. Note any negative impacts on equalities groups**

None.

**7iii. How significant would this negative impact be, and what kind of numbers would be affected?**

N/A

**7iv. Note any opportunities for making a positive impact on equalities groups.**

As noted earlier the Rent Setting Strategy will be a positive outcome for equalities groups requiring housing which meets their needs.

**Section D: Actions and Outcomes**

Questions 8 and 9 below ask about actions which have been taken, or will be taken **as a result** of this Equality Impact Assessment (EQIA). Any pre-existing actions should be included in earlier sections.

**8. Note any actions you will be taking as a result of this EQIA:**

Think about what you can do to:

- minimise or remove any negative impacts, and
  - maximise the opportunities for positive impacts
- Ensure that the Council and its partners consult with the wider community when taking decisions regarding future rent setting policies and in terms of future housing development.
  - Contribute to research on the housing needs of specific equality strands.

**9. Please note any actions you have already taken as a result of this EQIA here.**

N/A

**10. How will you track/monitor that the actions you mentioned in 8. have been achieved?**

e.g. by adding them to a work plan, service plan etc.

- Report on action in relation to equalities will be monitored via performance reporting in the Local Housing Strategy and Monthly Housing Performance Reports, and through feedback from consultation and engagement activities.

**11. If you have decided not to take any action please note why this is, and any justification, here.**

A significant negative impact, even if it affects only a small number of people, should be addressed.

N/A

**12. Is a more detailed assessment recommended?**

No